



July 27, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: South Carolina Energy Freedom Act (H.3659) Proceeding Initiated Pursuant to S.C. Code Ann. Section 58-40-20(C): Generic Docket to (1) Investigate and Determine the Costs and Benefits of the Current Net Energy Metering Program and (2) Establish a Methodology for Calculating the Value of the Energy Produced by Customer-Generators Docket No. 2019-182-E

Dear Ms. Boyd:

Dominion Energy South Carolina, Inc. ("DESC" or "Company"), pursuant to Order No. 2020-487 issued by the Public Service Commission of South Carolina ("Commission") on July 15, 2020, hereby submits these comments regarding the proposed scheduling order for the above-referenced docket.

The Commission's proposed procedural schedule is acceptable to DESC with one exception. The Company respectfully requests that the deadline of October 29, 2020, be extended by one week to November 5, 2020. DESC anticipates that the other parties of record may propose a methodology for calculating the value of the energy produced by customer-generators that differs from the methodology that DESC will propose for the Commission's consideration. In order for all parties to adequately evaluate any methodologies that may differ from what they proposed, the Company respectfully requests that the proposed October 29 deadline be extended to November 5, 2020.

As for further logistics, when DESC files its direct testimony on October 8, 2020, the Company will present its position on the cost and benefits of its current net metering program and also propose a methodology for calculating the value of the energy produced by customer-generators as indicated above. Additionally, the Company intends to present to the Commission for approval DESC's "solar choice

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metering tariff” in furtherance of S.C. Code Ann. § 58-40-20(F)(2). Therefore, when the Commission issues its scheduling order in this docket, the Company recommends that the Commission also issue an appropriate notice in a timely manner to ensure that the public has notice and opportunity to provide comments regarding the Company’s “solar choice metering tariff” as required by § 58-40-20(F)(2). It is the Company’s desire that when the Commission issues its final order in this docket, it will have (i) determined the costs and benefits of DESC’s current net energy metering program; (ii) established a methodology for calculating the value of the energy produced by customer-generators; and (iii) approved a “solar choice metering tariff” for DESC’s customers.

It is DESC’s understanding that the other parties in this docket may suggest alternative procedural schedules. In the event that the Commission adopts a procedural schedule that requires DESC to file direct testimony prior to October 8, 2020, then the Company will not have sufficient time to prepare and present to the Commission for approval its “solar choice metering tariff.” In that case, the Company will only file testimony regarding its position on the cost and benefits of its current net metering program and also propose a methodology for calculating the value of the energy produced by customer-generators. After the Commission issues an order ruling on those matters, then Company will be required to take the necessary steps to initiate a subsequent proceeding for the purpose of seeking approval of its “solar choice metering tariff.”

Based upon the foregoing, and in the interest of judicial economy, DESC respectfully requests that the Commission issue a procedural schedule that allows DESC to file direct testimony on October 8 which will include a “solar choice metering tariff” and be allowed until November 5 to file responsive testimony.

Thank you for providing the Company with the opportunity to submit these comments.

If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



K. Chad Burgess

KCB/kms

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cc: Carri Grube-Lybarker, Esquire
Heather Shirley Smith, Esquire
J. Blanding Holman IV, Esquire
Jeffrey M. Nelson, Esquire
Jeffrey W. Kuykendall, Esquire
Jenny R. Pittman, Esquire
Katherine N. Lee, Esquire
Rebecca J. Dulin, Esquire
Roger P. Hall, Esquire
Thadeus B. Culley, Esquire
(all via electronic mail only)